



CRIMINAL COMPLAINT

United States District Court		DISTRICT Eastern District of Pennsylvania	
UNITED STATES OF AMERICA v. Josh Leyland		DOCKET NO	
		MAGISTRATE'S CASE NO 19-1040	
Complaint for violation of Title 18 United States Code § 1073			
NAME OF JUDGE OR MAGISTRATE Honorable Richard A. Lloret		OFFICIAL TITLE U.S. Magistrate Judge	LOCATION Philadelphia, PA
DATE OF OFFENSE March 23, 2019	PLACE OF OFFENSE Philadelphia, PA	ADDRESS OF ACCUSED (if known) 28 West State Street, Trenton, NJ (Previous Known Address)	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION On or about March 23, 2019, in Philadelphia, in the Eastern District of Pennsylvania, defendant Josh Leyland, did unlawfully travel in interstate commerce from Philadelphia, Pennsylvania, to the state of New York, to avoid prosecution for Theft By Deception, Deceptive Practices, Home Improvement Fraud, Criminal Conspiracy and False Statement to Induce Agreement which are felony crimes under the laws of the Commonwealth of Pennsylvania in violation of Title 18 United States Code, Section 1073. After traveling to New York, Josh Leyland boarded a flight from John F. Kennedy International Airport to London, England, also in interstate commerce.			
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED SEE AFFIDAVIT ATTACHED HERETO.			
MATERIAL WITNESSES IN RELATION AGAINST THE ACCUSED			
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge. 		SIGNATURE OF COMPLAINANT (official title) Benjamin P Paris 	
		OFFICIAL TITLE Special Agent, Federal Bureau of Investigation	
Sworn to before me and subscribed in my presence			
SIGNATURE OF MAGISTRATE ⁽¹⁾ Honorable Richard A. Lloret, United States Magistrate Judge			DATE 6/13/2019

1) See Federal Rules of Criminal Procedure rules 3 and 54

1. I am a Special Agent with the Federal Bureau of Investigation, and have been since July 31, 2011. I am currently assigned to the Philadelphia Division. Since November 11, 2018, I have been assigned to the Violent Crimes Task Force ("VCTF") as a Special Agent. My current duties include, among other things, the investigation of bank robberies, Hobbs Act violations and fugitive investigations. This includes violation of Title 18 United States Code, Section 1073, Unlawful Flight to Avoid Prosecution.

2. On February 28, 2019 a victim, hereinafter referred to as "Victim" was approached at their residence in Philadelphia, Pennsylvania by several unidentified males (UNSUBS) wanting to inspect his roof. Two of the UNSUBS were later known to Victim as JUSTIN LNU and GARY MORGAN. One was later identified by Victim as JOSH LEYLAND (LEYLAND), a citizen of the United Kingdom. The UNSUBS offered to perform repair work on Victim's residence.

3. Victim initially provided a \$3000.00 cash deposit for roof repairs. Victim provided a cashier's check for \$30,000.00 on March 4, 2019 for what they believed would be repairs to walls and support beams for their roof. On March 7, 2019 Victim provided another cashier's check for \$31,000.00 for the same repairs. According to Victim, LEYLAND and the other UNSUBS told them that they needed an additional \$85,000.00 to complete the roof and support beam repairs. On March 11, 2019 Victim provided a cashier's check for \$40,000.00 and a final cashier's check for \$45,000.00 on March 15, 2019.

4. On March 18, 2019 Victim attempted to contact the UNSUBS they had paid to perform work on their home and found that the numbers were disconnected. Victim then contacted LEYLAND who stated that he could not get in contact with anyone. Victim advised LEYLAND that they were going to contact the police if the work was not completed.

5. The investigation conducted by the Philadelphia Police Department (PPD) revealed that LEYLAND fled the United States through JFK Airport to London, England on March 23, 2019. LEYLAND traveled on UK issued passport: 557995694. It is believed that LEYLAND fled the United States after the victim stated he was going to report the matter to the police. Customs and Border Protection (CBP) records show that LEYLAND arrived in the United States on 12/23/2018 after flying into McCarran International Airport, Las Vegas, Nevada.

6. On May 28, 2019, Detective Cavalieri of the Philadelphia Police Department obtained an arrest warrant for LEYLAND through Municipal Court of Philadelphia, Commonwealth of Pennsylvania on the following felony charges: Theft By Deception, Deceptive Practices, Home Improvement Fraud, Criminal Conspiracy and False Statement To Induce Agreement. A copy of this warrant is attached.

7. Further investigation by the Federal Bureau of Investigation (FBI) shows Currency Transaction Reports filed about LEYLAND that correspond to the cashier's check provided by Victim.

8. Based upon the above facts. Training and experience, your affiant believes JOSH LEYLAND has fled the Eastern District of Pennsylvania, in violation of Title 18 United States Code Section 1073, after learning that Victim intended to report the incident to law enforcement.



Benjamin P. Paris
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me

this 13th day of June, 2019



Honorable Richard A. Lloret
United States Magistrate Judge

Commonwealth of Pennsylvania
Philadelphia Municipal Court

County of: Philadelphia
First Judicial District



WARRANT OF ARREST

Original

COMMONWEALTH OF PENNSYLVANIA
V.
JOSH LEYLAND

Issuing Authority

AC Magistrate PATRICK STACK

Defendant's Address(s):

23 W State ST Trenton, NJ 08608

Citation/Complaint No : COM-0002866-2019

Docket No :

Warrant Control No : **WAR-0002866-2019**

Date Citation/Complaint Filed : 05/28/2019

Charge(s):

Code	Grade	Description	Count
CC3922	F2	THEFT BY DECEPTION	1
CC4107	F2	DECEPTIVE PRACTICES	1
TC517-8	F2	HOME IMPROVEMENT FRAUD	1
CC0903	F2	CRIMINAL CONSPIRACY	1
TC517-8.1	F3	FALSE STMT TO INDUCE AGREEMENT	1

Additional charges, if any, are listed on separate page

DESCRIPTIVE INFORMATION:

Social Security Number:

Sex: Male

Date of Birth: 07/30/1996

Telephone Number: (215)000-0000

Age: 22

Height: 5'8

Weight: 150

Race: White

Eye Color: Unknown

Hair Color: Brown

Distinguishing features (scars, tattoos, facial hair, disability, etc):

SPEAKS WITH AN IRISH OR BRITISH ACCENT

Alias(es):

TO POLICE OFFICER:

In the name of the Commonwealth of Pennsylvania, you are commanded to take
the defendant, into custody for 1101 Fraud false pretense
Issued under my hand this 28 day of May, 2019

JOSH LEYLAND,

Signature Issuing Authority



Commonwealth of Pennsylvania
County of Philadelphia

AFFIDAVIT OF PROBABLE CAUSE

Copy

Affiant:

DET PATRICK CAVALIERI PATRI 665 South Detectives Division

Warrant Control Number:

AFF-0002856-2019

PROBABLE CAUSE BELIEF IS BASED UPON THE FOLLOWING FACTS AND CIRCUMSTANCES:

1. That after investigation I have probable cause to believe that a warrant of arrest should be issued for:

Defendant Name: JOSH LEYLANDGender: M Race: White

Alias:

DOB: 07/30/1996 Pid:Address: 23 W State ST Trenton, NJ 08608

CHARGES:

DC Number	Code	Grade	Description	Count
1903018311	CC3922	F2	THEFT BY DECEPTION	1
	CC4107	F2	DECEPTIVE PRACTICES	1
	TC517-8	F2	HOME IMPROVEMENT FRAUD	1
	CC0903	F2	CRIMINAL CONSPIRACY	1
	TC517-8.1	F3	FALSE STMT TO INDUCE AGREEMENT	1

2. That the facts tending to establish the grounds for the issuance of the warrant of arrest and the probable cause for my belief are as follows: (Note: if extended text exists, see following page(s))

I, THE AFFIANT, BEING DULY SWORN ACCORDING TO LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF AND THAT PROBABLE CAUSE TO ARREST EXISTS.

Affiant: DET PATRICK CAVALIERI PATRI 665 South Detectives Division

Sworn to or affirmed and subscribed before me this 28 day of May , 2019

Det. Cavalieri

Affiant Signature

Reed

Issuing Authority Signature



Commonwealth of Pennsylvania
County of Philadelphia

AFFIDAVIT OF PROBABLE CAUSE

Copy

Affiant:

DET PATRICK CAVALIERI PATRI 665 South Detectives Division

Warrant Control Number:

AFF-0002866-2019

1903018311 On 2/28/19 at 7xx S. 2nd Street the complainant, (R.G.) was approached by several unknown males with Irish accents at his residence, the males stated they wanted to inspect his roof. The males inspected the roof and on 3/1/19 the males returned and stated the work would cost approximately \$4,200.00 USC. On 3/1/19 (R.G.) gave a cash deposit of \$3,000.00 USC to begin the roof work. On 3/4/19, the repair work on the roof began and as work continued the men told (R.G.) he also needed a wall and support beams which would cost \$30,000.00 USC. On 3/4/19, (R.G.) gave one of the workers known to him as "Justin" cashier's check #68008002013 for \$30,000.00 USC. On 3/7/19 one of the workers known as "Gary Morgan" informed (R.G.) the support beams would require an additional payment of \$31,000.00. On 3/7/19 (R.G.) gave Gary Morgan cashier's check #6818801790 for \$31,000.00 USC. On 3/11/19, "Justin" told the complainant his wall and support beams needed to be replaced totaling \$85,000.00 USC in repairs. On 3/11/19, (R.G.) gave one of the workers known as "Josh Leyland" cashier's check #68008002018 for \$40,000.00 USC. On 3/15/19, the complainant gave Josh Leyland cashier's check #6808002021 for \$45,000.00 USC.

These males only performed a small portion of the work and charged the complainant an exorbitant amount of money totaling over \$149,000.00 USC. On 3/18/19, the complainant attempted to contact the workers by phone and the numbers were disconnected and no one has contacted him or been back to finish the work. The cashier's checks were all endorsed to "Josh Leyland". The cashier's checks were all drawn on Wells Fargo account number #4861-009033.

On 4/12/19, search and seizure warrant #218607 was executed at Wells Fargo Bank. On 4/19/19 the affiant arrived at Lombardo's check cashing agency located at 115 South Street in the city and county of Philadelphia within close proximity to the complainant's home. Recovered were copies of 4 cashier's checks all made payable to "Josh Leyland". Check #6808002013 for \$30,000.00, #6818801790 for \$31,000.00, #6808002018 for \$40,000.00 and #6808002021 for \$45,000.00. Also recovered was a copy of a United Kingdom of Great Britain and Northern Ireland passport #557995694 in the name of Josh Leyland which was used as identification in order to cash the checks.

On 5/2/19 the complainant, (R.G.) was shown a photo array and did identify the offender Josh Leyland. The complainant is also elderly and in frail health making him an easy target for scam artist. On 4/26/19 the affiant contacted Det. Wallace #0685 from the Joint Terrorism Task Force and discovered the defendant departed from JFK airport in New York and arrived in London, England on 3/23/19. The affiant respectfully request an arrest warrant for British citizen Josh Leyland, date of birth 7/30/96 born in Birkenhead, England.

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

I, THE AFFIANT, BEING DULY SWORN ACCORDING TO LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF AND THAT PROBABLE CAUSE TO ARREST EXISTS.

Affiant: DET PATRICK CAVALIERI PATRI 665 South Detectives Division

Sworn to or affirmed and subscribed before me this 28 day of May , 2019

Det. Cavalieri

Affiant Signature

Book

Issuing Authority Signature

